

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS,  
EASTERN DIVISION**

CITY OF CHICAGO <i>EX REL.</i> AARON	)	
ROSENBERG,	)	
	)	
Plaintiff,	)	
	)	Case No. 15-cv-8271
v.	)	
	)	Judge John J. Tharp, Jr.
REDFLEX TRAFFIC SYSTEMS, INC.	)	
and REDFLEX HOLDINGS, LTD.	)	
	)	
Defendants.	)	

**JOINT MOTION FOR ENTRY OF CONFIDENTIALITY ORDER**

Pursuant to Federal Rule of Civil Procedure 26(c), Plaintiff City of Chicago *Ex Rel.* Aaron Rosenberg (“City of Chicago”) and Defendants Redflex Traffic Systems, Inc. and Redflex Holdings, Ltd. (together “Redflex”) hereby move this Court to enter the proposed Agreed Confidentiality and FRE 502(d) and (e) Clawback Order attached hereto as Exhibit A (the “Confidentiality Order”).

1. The City of Chicago and Redflex agree that a Confidentiality Order should be entered to govern discovery in this action, and that there is good cause for the entry of the Confidentiality Order attached as Exhibit A.

2. Through their discovery requests, the Parties seek information regarding the confidential information of Redflex and the City of Chicago, including non-public financial information, customer information, marketing and pricing information.

3. To protect the confidential nature of the documents and information exchanged in discovery, the parties have agreed to the proposed Confidentiality Order attached hereto. The proposed Order would allow the parties to use confidential information for purposes

of this litigation while restricting the unnecessary disclosure of the information to third parties or for purposes unrelated to the litigation.

4. There is good cause for entry of the Confidentiality Order under Rule 26(c) of the Federal Rules of Civil Procedure.

5. Pursuant to the Court's Standing Order, the parties have based their Confidentiality Order on the Model Confidentiality Order contained in this Court's Local Rules (LR26.2). Additionally, the parties have attached a redline (Exhibit B to this Motion) that indicates additions or deletions to the model text.

6. The proposed Confidentiality Order is drafted to ensure that legitimately confidential information is designated as confidential while, at the same time, ensuring that the Court's decision-making is sufficiently open to the public. The proposed Confidentiality Order permits the parties to designate certain identified categories of documents during discovery as "Confidential" or "Highly Confidential-Attorneys' Eyes Only."

7. Discovery will be facilitated, and the confidential information of the parties (and non-parties whose confidential information the parties have or may be asked to disclose) will be fairly protected by entry of the Confidentiality Order attached as Exhibit A.

8. Accordingly, the proposed Confidentiality Order serves the parties' legitimate interests in this case without prejudicing any party's rights.

### **CONCLUSION**

WHEREFORE, based on the foregoing, the Parties respectfully request this Court to enter the proposed Confidentiality Order attached hereto as Exhibit A.

Dated: October 27, 2016

Respectfully submitted,

/s/ Anthony J. Masciopinto  
*Attorneys for City of Chicago*

/s/ William B. Berndt  
*Attorneys for Redflex Traffic Systems, Inc.  
and Redflex Holdings, Ltd.*

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**CERTIFICATE OF SERVICE**

I, William B. Berndt, an attorney, hereby certify that on this 27th day of October, 2016, I electronically filed the foregoing **Joint Motion for Entry of Confidentiality Order** with the Clerk of the Court using the CM/ECF system, which thereby electronically served all counsel of record.

/s/William B. Berndt \_\_\_\_\_